FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Empowering Consumers through	)	**CG Docket No. 26-239**
Robocall Scorecard	)	
	)	

Comments of

National Consumer Law Center
(on behalf of its low-income clients)

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Comment

Introduction and Summary

These Comments, submitted by the National Consumer Law Center (NCLC) on behalf of its low-income clients, are in response to the Federal Communications Commission's (Commission) Public Notice released on September 2, 2026, Consumer and Governmental Affairs Bureau Seeks Comment on Robocall Scorecard, CG Docket No. 26-239 (Public Notice).[1]

A voice service provider's effort, or lack of effort, to keep illegal callers off of its network is often invisible to potential customers, and the proposed Robocall Scorecard is a laudable approach to providing consumers with meaningful information about how much providers value their customers' safety from phone scams and other illegal calls. However, the value of the Scorecard depends on the details of implementation. If the Scorecard uses flawed metrics or is not presented appropriately, then not only is it less useful for assessing providers, but it risks creating a false sense of security, which could make consumers less skeptical of incoming calls than they need to be.

Section I of this Comment responds to the Public Notice's questions regarding which providers should receive a Scorecard rating.[2] We agree that the Scorecard should rate only domestic voice service providers with retail customers. Retail in this context should be interpreted broadly to include residential, small business and dual-use lines, as consumers and small businesses are similarly impacted by illegal and unwanted calls, and voice service providers may not differentiate between these types of users. Also, in the first iteration of the Scorecard the Commission should rate as many providers as possible, focusing for now on the ones with the largest number of customers.

Additionally, the Scorecard should differentiate between mobile network operators (MNOs) and mobile virtual network operators (MVNOs), because MVNOs often do not control network

[1] Available at: https://docs.fcc.gov/public/attachments/DA-26-932A1.pdf.
[2] Public Notice at ¶¶ 7-8

elements necessary to independently block illegal and unwanted calls and must rely on the MNOs whose services they resell for network-level call blocking. Though MVNOs should still be scored, the Scorecard should inform consumers that these providers may be unable to control which calls are blocked, but make clear the MVNOs are being scored on items that they do have control over.

Section II of this Comment responds to the Public Notice's questions about the metrics and information sources that should inform the Scorecard.[3] The Scorecard should give positive ratings to voice service providers that follow sound robocall mitigation practices and provide better customer experiences. Specifically, we recommend that the Commission build Scorecard ratings based on the following: a) call blocking tools provided to subscribers, b) robocall mitigation programs, c) complaints concerning illegal and unwanted calls, d) traceback history, and e) STIR/SHAKEN implementation. We suggest that the Commission generate specific guidance to providers on how each of these areas will be scored, which will encourage voice service providers to adopt appropriate practices to earn positive ratings. We believe a Scorecard that addresses these areas will both supply consumers with necessary information to make informed decisions and encourage providers to employ sound robocall mitigation policies. However, we suggest that the Commission periodically review and adjust the Scorecard after providing an opportunity for public comment. This will ensure that the Scorecard is appropriately tailored and effective at preventing illegal calls.

While we support thoughtful implementation of a Robocall Scorecard, increased information is not a substitute for safe networks and does not negate the need for accountability and enforcement. Providers should still be required to keep illegal calls off their network and should be held liable if they knowingly transmit illegal calls. Guidance to consumers about providers' robocall mitigation practices can help consumers protect themselves, but the most valuable benefit of a

[3] Public Notice at ¶¶ 9-19.

Robocall Scorecard is to encourage providers to do a better job protecting their customers. These comments urge the Commission to focus on developing metrics that will both inform consumers and push providers to improve network safety.

I. The Robocall Scorecard Should Have a Broad Scope and Accommodate Varying Network Types.

We support the Commission's proposal to rate "only domestic voice service providers with retail customers, and not those who operate solely as wholesale or intermediate providers."[4] Retail subscribers, meaning consumers and small businesses who purchase voice service for both inbound and outbound calls, will benefit most from the Scorecard because they are most likely to use the Scorecard's ratings when choosing a voice service provider. Commercial callers, and particularly those who primarily place outbound calls, are more likely to choose voice service providers based on cost and volume limitations rather than a provider's robocall mitigation policies.

a. *The Commission should create Scorecards for as many of the largest voice service providers as possible*.

There are likely too many domestic voice service providers with retail customers for it to be feasible to construct a Scorecard for each one. Accordingly, we recommend that, at least for now, the Commission rate providers only if they have substantial numbers of retail customers. The Commission should select a threshold based on the number of fixed or mobile voice service subscribers reported on Form 477.[5] We urge the Commission to create Scorecards for as large a proportion of the retail voice service market as possible while still allowing the Commission to produce and update the Scorecards in a reasonable timeframe. The Scorecards should include, in an easy to see location, the date the Scorecard was created or updated. This will enable consumers to know that the information is up-to-date.

[4] Public Notice at ¶ 7.

[5] We believe that where providers disclose large numbers of voice subscriber lines on Form 477, the Commission should assume that they provide service primarily to consumers and small businesses.

Rating smaller providers and providers that offer service primarily to commercial callers or other voice service providers would be unlikely to reduce fraud enough to justify the amount of time and effort necessary. However, we urge the Commission to review whatever threshold it adopts periodically, and to be prepared to adjust them in light of the performance of the Scorecard and the ease or difficulty of obtaining and analyzing the relevant data. More broadly, the Commission should commit to reviewing all aspects of the Scorecard on a regular schedule, as discussed in section II(f).

b. *Scorecards should disclose the extent to which an MVNO controls network equipment necessary for call blocking and STIR/SHAKEN implementation*.

The retail voice service marketplace is mainly comprised of MNOs, MVNOs, and residential switched access or VoIP providers. MVNOs frequently resell cellular service provided by one or more MNOs, and thus do not always control the network elements needed to perform analytics-based call blocking or STIR/SHAKEN implementation. As discussed further below, these are highly salient features of a provider's robocall mitigation strategy and should not be elided on the Scorecard. We recommend that Scorecards for MVNOs clearly disclose which mobile networks' services are being resold and whether calls to the MVNOs' subscribers are subject to the same analytics-based blocking and STIR/SHAKEN implementation as the MNO offers to its own subscribers. This information is frequently included in an MVNO's robocall mitigation plan filed in the Robocall Mitigation Database.[6] The Commission should consider mandating that MVNOs list this information in their mitigation programs to the extent it is not currently required.

II. <u>Scorecard Ratings Should be Based on Robocall Mitigation Practices and Consumer Experiences.</u>

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[6] *See, e.g.*, robocall mitigation filing of US Mobile, Inc., disclosing that US Mobile resells services from AT&T, T-Mobile, and Verizon. Available at: https://fccprod.servicenowservices.com/api/x_g_fmc_rmd/rmd/attachment?sys=8ba20db547d3b61073fd0c03e16d436a.

The Commission's proposed Robocall Scorecard, if it is updated regularly and includes timely adjustments as new information becomes available, can both present information that helps consumers to choose a voice service provider as well as encourage voice service providers to adopt best practices. While the Commission could initiate proposed rulemakings to require providers to report additional information for Scorecard ratings, the Commission should begin by using publicly available information and existing filing requirements to construct Scorecard metrics. Consistent with the goals of providing useful information to consumers and incentivizing providers to adopt sound policies, we recommend that the Scorecard rate the following areas: a) call blocking tools provided to subscribers, b) robocall mitigation programs, c) complaint trends concerning illegal and unwanted calls, d) traceback history, and e) STIR/SHAKEN implementation.

a. *Call Blocking Tools*

The Scorecard should give a positive rating to providers that offer their customers robust call blocking and labeling tools at no additional cost and promote these services to consumers or community-based organizations (e.g., point of sale, website, ad campaigns, materials shared with community organizations and digital literacy organizations, etc.). At least 12 major voice service providers endorsed offering free call blocking and labeling tools in the Anti-Robocall Principles for Voice Service Providers issued in conjunction with 51 State Attorneys General.[7] Also, the Commission has gathered and publicized information about call blocking resources on its website.[8] We recommend developing rating criteria based on the functions made available to consumers at no additional cost through these apps and other services. For instance, the Commission could establish a basic set of functions that qualify for an average Scorecard rating, such as the ability to block or

[7] Anti-Robocall Principles, at pg. 2, Principle #1. Available at: https://www.ustelecom.org/wp-content/uploads/2019/08/State-AGs-Providers-AntiRobocall-Principles-With-Signatories.pdf
[8] https://www.fcc.gov/call-blocking.

label calls based on the expected content of the call (e.g., telemarketing, political calls, survey calls, etc.).

The Commission could also incentivize providers to offer additional protections to consumers by establishing a set of advanced functions that qualify for higher ratings, such as the ability to look up subscriber information associated with a calling telephone number, or the ability to block all calls that have STIR/SHAKEN information which indicates they were originated by a particular provider.

We recommend that the Scorecard give a negative rating to providers that do not offer call blocking tools and resources or which charge consumers to access them, give an average rating to providers that offer basic functions at no extra charge, and give a positive rating to providers that offer robust call blocking and labeling tools at no extra charge.

b. *Robocall Mitigation Programs*

The Commission's rules at 47 C.F.R. § 64.6305(d)(1)-(2) require voice service providers to file a certification that all calls they originate are subject to a robocall mitigation program which includes specific reasonable steps they have taken to avoid illegal robocall traffic. We recommend that the Scorecard rate robocall mitigation programs on these specific, reasonable steps. In order to ensure consistent rating criteria, the Commission should specify aspects of robocall mitigation programs that must be present to garner a positive Scorecard rating.[9]

For example, robocall mitigation programs should be given positive ratings when they include analytics-based blocking triggered by objective criteria such as average call duration, number and velocity of unique calls generated from a single subscriber, multiple or overlapping calls on the

[9] We do not suggest that the Commission should specify exact thresholds for call blocking, such as exact figures for average call duration or call velocity which would result in call blocking. Exact thresholds should not be disclosed in a robocall mitigation database filing to avoid alerting bad actors as to how to manipulate providers' analytics-based blocking programs.

same account or line, and device change frequency and IMEI or IMSI mismatch patterns. Robocall mitigation programs that include analytics-based blocking but do not broadly employ blocking criteria the Commission highlight as appropriate criteria for a strong analytics-based blocking program should be given an average rating. Programs that do not include analytics-based blocking should be given negative ratings. Similarly, the Commission should develop rating criteria based on providers' know-your-customer policies and other required elements of robocall mitigation programs.

Additionally, we encourage the Commission to identify specific best practices that will impact Scorecard ratings. For instance, 47 C.F.R. § 64.1200(o) requires providers to block calls purporting to originate from a reasonable do-not-originate list. Some providers require payment in exchange for adding telephone numbers to their do-not-originate list. We believe this practice, and others which undercut efforts to prevent the origination of illegal calls, should be discouraged. We suggest that the Commission award higher Scorecard ratings to robocall mitigation programs which state that the provider adheres to best practices, such as not charging directly or indirectly for adding phone numbers to the providers' do-not-originate list. This will incentivize providers to improve their mitigation programs.

c. *Complaints concerning illegal and unwanted calls*

We agree with the Commission that FCC Consumer Complaints Center data and Federal Trade Commission data are useful sources of information for the Scorecard.[10] However, the Commission should not develop metrics based on the aggregate number of complaints about illegal robocalls on the providers' network, as this will unfairly penalize providers who are more likely to be the subject of complaints merely because they run larger networks. Rather, the Commission should

[10] Public Notice at ¶ 10.

base ratings on trends in complaint numbers and the number of complaints received as a proportion of the provider's total number of retail subscribers. Providers who are able to reduce the number of complaints over a given reporting period and have a low proportion of complaints relative to subscribers should receive positive Scorecard ratings, whereas providers who allow complaints to increase and have a high proportion of complaining customers should receive negative ratings. An average rating is appropriate for providers who do not receive substantially more or fewer complaints over a reporting period, and the Scorecard should not state a rating in this area for providers who do not have a complaint history sufficient to determine any trend in complaint numbers. This system will both inform consumers of how well providers address complaints about illegal and unwanted calls and will encourage providers to take action to remedy issues identified by complaining consumers.

d. *Traceback History*

The number of tracebacks a provider has received, standing alone, is not a useful metric for the Robocall Scorecard. Traceback volume will generally be larger for providers with more subscribers and providers who work with the Industry Traceback Group to initiate tracebacks of illegal calls received by their subscribers. It would be unfair to give providers a negative Scorecard rating for initiating tracebacks in a good faith effort to identify sources of illegal traffic.

However, the steps that a provider takes after receiving tracebacks can form the basis of a useful Scorecard metric. For instance, a history of tracebacks concerning the same originators or non-responsive providers indicates that a provider is willing to overlook this source of illegal calls or has otherwise failed to take effective action to stop illegal calls from an identified upstream source. Accordingly, Scorecards should give a positive rating to providers who report terminating upstream customers in response to tracebacks and do not subsequently receive additional tracebacks regarding those upstream providers or call originators. Providers who demonstrate a history of repeated tracebacks involving the same upstream providers or originating callers should receive negative Scorecard ratings in this area. Providers who have responded to tracebacks but have not disclosed any specific action they have taken in response to the traceback should receive average ratings, and a provider without a traceback history should not receive a rating in this area.

e. *STIR/SHAKEN implementation*

The STIR/SHAKEN caller ID authentication framework should also inform Robocall Scorecard ratings. However, merely signing calls and transmitting STIR/SHAKEN information downstream through the call path does not provide the basis for a useful metric with respect to robocall mitigation, as this is merely the minimum required by the law and the Commission's regulations. Instead, the Scorecard should provide ratings based on how providers use STIR/SHAKEN information to address illegal and unwanted calls.

We urge the Commission to develop best practices leading to tangible consumer benefits with respect to the use of STIR/SHAKEN information and to give providers that attest that they follow these best practices positive Scorecard ratings.[11] For instance, providers should transmit STIR/SHAKEN information, including the identity of the originating provider and the call attestation level, to a subscriber's handset device or voicemail provider. Making this information available to the subscriber allows equipment manufacturers to incorporate the information into tools that subscribers can use to protect themselves from illegal and unwanted calls. Similarly, providers who allow subscribers, for free, to block calls based on STIR/SHAKEN information such as the attestation level or the originating provider should receive higher Scorecard ratings in this area. Providers who elect not to follow some or all of the Commission's STIR/SHAKEN best practices should receive lower Scorecard ratings in this area.

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[11] Mere attestations can be overridden by consumer complaints or other substantial indications that the attestations were false or incomplete, leading to a lower scorecard rating.

f. *Ongoing review and adjustment*

In paragraph 6 of its Public Notice, the Commission states "there must be an iterative process to improve the Scorecard." We are in full agreement with this principle, and urge the Commission to commit to a schedule of review and evaluation in its final decision about the Scorecard.

The Scorecard is a creative addition to the Commission's efforts to stop illegal calls, but it is ambitious and will need periodic refinement. It will be important, after some time in operation, to evaluate whether ratings accurately capture the level, intensity, and quality of providers' activities to stop illegal calls. It will also be critical to evaluate consumers' use and understanding of the Scorecard. Scammers are both relentless and inventive, and so it will be necessary to evaluate whether the rating criteria need to be adjusted because bad actors have found ways to evade the measures on which the ratings are based. New data sources may also have become available, and the Commission may develop automated ways to collect and analyze data making it possible to include a larger number of providers in the Scorecard. All these are reasons that the Commission should evaluate the Scorecard and be prepared to adjust it.

As part of the review, the Commission should commit to providing a comment period of at least 45 or 60 days, so that potential commenters can gather data and submit thoughtful comments. The review schedule should be made public at the outset, so that telecommunications providers, users, advocates, and the general public are assured that reviews will occur and know when they will be called upon to submit data and comments.

The review schedule should go beyond a one-time event and commit to an initial review followed by periodic reviews on a regular schedule. Efforts to fight illegal calls cannot be static. To ensure that the Scorecard is a useful new tool for combating scams and other illegal calls, the

Commission must be prepared to monitor and adjust it in synch with changes in the country's telecommunications system and scammers' efforts to subvert it.

CONCLUSION

We applaud the Commission for its willingness to pursue creative ideas to protect consumers from scams and other illegal calls, and we are grateful for the opportunity to provide suggestions in response to the Public Notice.

Respectfully submitted this 22nd day of September 2026, by:

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